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May 29, 1998

Hon. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: In the Matter of Performance Measurements
and Reporting Requirements for Operations
Support Systems, Interconnection, and
Operator Services and Directory Assistance
CC Docket No. 98-56

Dear Secretary Salas:

The New York State Department of Public Service (NYDPS) submits this letter in response to the April 17, 1998 Notice of Proposed Rulemaking inviting comments on its Operations Support Systems (OSS) model performance measurements and reporting requirements. These model guidelines are intended to help competitors and state commissions evaluate the access that incumbent exchange carriers (ILECs) provide through their Operations Support Systems (Notice of Proposed Rulemaking para. 4). The NYDPS generally endorses the Commission's approach of establishing a preliminary model as guidance to state commissions, because model guidelines should assist states in developing OSS standards.

Recently, the NYDPS implemented interim carrier to carrier performance measurements and reporting guidelines for use in New York during 1998. The Commission's model performance measurements and reporting requirements and the NYDPS interim guidelines are generally consistent. The interim guidelines for New York were developed in a consensus process involving a diverse group of parties, including Bell Atlantic-New York and a number of competitors. This effort will continue throughout 1998 in order to enable parties to monitor the implementation of the interim guidelines, review the performance results, and evaluate the need for further changes. A copy of these preliminary guidelines is enclosed. We expect to implement final guidelines and/or rules by the end of the first quarter of 1999 and will provide a copy to the Commission.

Hon. Magalie Roman Salas
NYDPS OSS Comments

May 29, 1998

We agree that the Commission should not adopt model performance standards until the parties have had an opportunity to review the actual data over time (Notice of Proposed Rulemaking para. 124).¹

Sincerely,



Lawrence G. Malone
General Counsel
Public Service Commission
of the State of New York
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Attachment
cc: All Parties

¹ To the extent that the Commission merely proposes model rules and does not attempt to preempt OSS measurements or standards adopted by state commissions, the Commission does not run afoul of 47 U.S.C. §§ 152(b), 251 and 252 or Iowa Util. Bd. v. FCC, 120 F.3d 753 (8th Cir. 1997).

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CASE 97-C-0139

Interim Guidelines

Carrier to Carrier Performance Standards and Reports

TRIAL PERIOD

January - December 1998

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CASE 97-C-0139

Interim Guidelines

Carrier to Carrier Performance Standards and Reports

TRIAL PERIOD

January - December 1998

Introduction:

These Interim Guidelines were created by a consensus process through the New York State Public Service Commission Proceeding to Review Service Quality Standards of Telephone Companies (Case 97-C-0139). The Guidelines and the accompanying documents (referred to collectively herein as "The Guidelines") were developed by the Carrier-to-Carrier working group in this proceeding to obtain the data and experience necessary to monitor Carrier-to-Carrier performance and to determine the need for the Commission to adopt formal rules.

The Guidelines will apply during the data gathering phase of this proceeding and are not meant to replace or supersede interconnection agreements among carriers or any continuing negotiations concerning performance measurements, standards, reporting requirements or remedies, including any other duties or obligations imposed by this Commission or the Federal Communications Commission. The Carrier-to-Carrier Working Group will meet throughout 1998 to monitor performance and to modify The Guidelines as necessary. The Working Group will make a recommendation at the end of the year whether The Guidelines should be further modified and later adopted as Commission rules, or remain as industry guidelines.

Baseline standards contained in this package apply to Bell Atlantic - New York ("BA-NY") and Frontier Telephone of Rochester, Inc. ("FTR").¹ For other Incumbent Local Exchange Carriers ("LECs"), these Guidelines should serve as a basis for future negotiations between requesting carriers and incumbent LECs, giving due consideration to each party's specific needs and capabilities. The Guidelines do not establish a presumption for measurement and/or reporting of any specific metric as detailed herein for the other LECs. However, each such LEC will provide services at parity to those provided to its own end user customers assuming normal quantities of service ordered, and will report those service quality measurements currently reported to the Public Service Commission disaggregated between retail and wholesale markets.

The Guidelines include the following:

- Performance Standards and Reports²: a comprehensive document including explanations of the measurement methodology, definitions of standards, reporting levels, geography covered, current product intervals, and cross references to the FCC Order Approving the Bell Atlantic/NYNEX Merger and to LCUG recommended measures.
- Competitive Local Exchange Carriers ("CLEC") Forecast Guide for Interconnection Trunks. (Appendix A)
- The carrier consensus working document: a working document used to develop the performance standards and reports included in the Interim Guidelines. (Appendix B)

¹ FTR does not provide unbundled elements and flow-through orders. FTR will develop UNE products when a request is received and will explore additional reporting during the trial period.

² Any CLEC not a member of the Carrier to Carrier working group that wants to obtain reports produced pursuant to the Guidelines must contact the Account Manager that the incumbent LEC has designated to make the appropriate arrangements.

- A statistical tool for evaluating parity performance (Appendix C)
- A Forum to Resolve Questions of Interpretation and Process and Recording Keeping including recording keeping procedures.³ (Appendix D)

³Root cause analysis will always be a key tool in evaluation of performance. Data from root cause analysis will be the subject of discussion throughout the year.

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
New York State
January - December 1998

Pre-Ordering:

Metric A - Response Time OSS Interface:

"Response time" is defined as time (in seconds) that elapses from the submission of a query request to the receipt of a response by the requesting carrier (at the access platform for CLECs and directly to OSS for BA). (Does not apply to BA-NY GUI interface).

BA-NY Notes:

Methodology: BA-NY: Sample via simulation of Service Representatives' (both BA and CLEC) requests using Sentinel System. Ten Transactions per hour per transaction type, Monday - Friday 8 AM to 5 PM. Note: Telephone number will be sampled at 1 transaction per hour due to potential impact on telephone number inventory.

Other Pre-Ordering, an FCC reported metric, is defined as the aggregate of four pre-ordering functions: (1) Due Date Availability, (2) Address Validation, (3) Product Service Availability (Feature Function) and (4) Telephone Number Availability.

FTR Notes:

Parity if CLEC uses direct access to OSS.

LCUG Reference: LCUG P01

Reported Sub-metrics :

Report Level:

Geography: New York State

Reported for:

BA Retail

CLEC aggregate

BA-NY Reports:

Average Response Time:	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure¹</u>
1. Customer Service Record	Parity with Retail plus not more than 4 seconds	• OSS	FCC
2. Other Pre-Ordering	Parity with Retail plus not more than 4 seconds	• OSS	FCC
3. Due Date Availability	Parity with Retail plus not more than 4 seconds	• OSS	
4. Address Validation	Parity with Retail plus not more than 4 seconds	• OSS	
5. Product and Service Availability	Parity with Retail plus not more than 4 seconds	• OSS	
6. Telephone Number Availability and Reservation	Parity with Retail plus not more than 4 seconds	• OSS	

¹ Measures included in FCC Merger Order on Bell Atlantic Merger

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
New York State
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Metric B - OSS Interface Availability:

Note: Includes OSS access for ordering as well as maintenance.

BA-NY Notes:

"System availability" measures the hours during which the Carrier Interface (DCAS) is actually available as a percentage of scheduled availability. Bell Atlantic service representatives and CLEC service representatives obtain pre-ordering information from the same underlying OSS. As a result, if a particular OSS is down, it is equally unavailable to Bell Atlantic employees and to CLEC employees. Any difference in availability, therefore, will be caused by unavailability of the interface.

LCUG Reference: LCUG GE1

Reported Sub-metrics :

Report Level:

Geography: New York State

Reported for:

BA Retail - OSS

CLEC aggregate - OSS

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
7. OSS Interface Availability:	24 hours, 7 days a week Access to Interface	• OSS	FCC

Contact Center Availability

Metric C - Availability of Centers for CLECs (Resale Center and CATC).

BA-NY Notes:

Contact with CLECs is designed to take place via direct access systems. Carrier support centers are designed to handle fall out and not large call volume. Call Management system under development.

FTR Notes:

Porting and Activation can be pre-arranged for Saturday.

LCUG Reference: LCUG GE2 & 3

**Interim Guidelines for Carrier to Carrier Performance Standards & Reports
New York State
January - December 1998**

Standard:

BA-NY: Center Open 24 hours, 7 days a week

FTR: 8 AM to 8 PM, Monday through Friday

Reported Sub-metrics :

BA-NY Reports:

- No Reports on Contact Center Availability

Ordering:

All Ordering BA-NY Reports:

Report Level:

Geography: New York State

Reported for:

CLEC specific

CLEC aggregate

Metric D - Order Confirmation Timeliness:

Definitions For Resale and Unbundled Network Elements:

Average Response Time (% w/in response time): The amount of elapsed time (in hours) between receipt of a valid order request and distribution of a service order confirmation. Orders that are rejected will have the clock re-started upon receipt of a valid order. Hours exclude weekends and Holidays. (BA-NY to provide holiday schedule.) All Orders Received after 3 PM are considered received the next business day at 8AM.

Non-Mechanized (Manual Orders): Orders received via DCAS that are not processed directly into the legacy provisioning systems. These orders must be manually entered by a BA representative into the BA Service Order Processor (SOP) system. For orders received in a non-electronic fashion (such as fax), 24 hours are added to all intervals.

≥ 10 lines: In some geographic areas, a facility check is completed on orders greater than 5 lines. In all geographic areas, orders with 10 or greater lines require a facility check prior to order confirmation and due date commitment.

Mechanized (Flow-Through Orders): These orders are received electronically through the ordering interface and require no manual intervention to be entered into the SOP.

Other: Discussion of batch intervals e.g., several over course of workday acceptable, versus one time, end of day batch could affect interval and will be resolved during interim guideline period. UNE Switching assumes switch activation following NDR process.

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
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Standards apply to orders sent electronically.

For Interconnection Trunks:

All ASRs must be electronically transmitted for FOC intervals to apply. BA-NY: FOC will be sent after actual, physical check for interoffice facilities and switch equipment. 10 day interval up for review by end of 3Q98.

(Trunks) Average Order Confirmation Response Time: The amount of elapsed time (in days) between receipt of a valid ASR (Access Service Request) and distribution of a service order confirmation. Orders that are rejected will have the clock re-started upon receipt of a valid order.

% Firm Order Confirmations > 10 Days: The percent of Firm Order Confirmations confirmed more than 10 days after receipt of a valid ASR.

Timeliness of Design Layout Record (FDLR/CDLR): (To be reported effective with implementation of full ASR [release version 18] process). No LCUG Reference for FDLR/CDLR.

LCUG Reference: LCUG OP4 & 5

Reported Sub-metrics :

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
8. Avg. Order Confirmation Response Time: (Non-Mechanized orders < 10 lines)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC
9. % Order Confirmation within 24 Hrs: (Non-Mechanized orders < 10 lines)	90% within 24 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS 	
10. % Order Confirmation within 48 Hrs: (Non-Mechanized orders < 10 lines)	90% within 48 Hours	<ul style="list-style-type: none"> • Resale Specials • UNE Specials 	
11. Avg. Order Confirmation Response Time: (Non-Mechanized orders ≥ 10 lines)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC
12. % Order Confirmation within 72 Hrs: (All Orders ≥ 10 lines)	90% within 72 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	
13. Average Order Confirmation Response Time: Mechanized orders (Flow-Through)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
New York State
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	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
14. % Order Confirmation within 2 Hrs: (Mechanized Orders)	90% within 2 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	
15. Average Order Confirmation Response Time (All Orders)		<ul style="list-style-type: none"> • Interconnection Trunks 	FCC
16. % Firm Order Confirmations > 10 Business Days	90% within 10 Days	<ul style="list-style-type: none"> • Interconnection Trunks 	FCC
17. Timeliness of Design Layout Record (FDLR/CDLR) (<i>report under development</i>)	90% within 10 Days	<ul style="list-style-type: none"> • Interconnection Trunks 	

Metric E - Reject Notice Timeliness:

Response Time - Reject: The amount of elapsed time (in hours) between receipt of an order request and distribution of a reject. Same mechanized/non-mechanized definitions as Order Confirmation timeliness.

LCUG Reference: LCUG GE2 & 3

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
18. Average Reject Response Time: (Non-Mechanized orders < 10 lines)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC
19. % Reject within 24 Hours: (Non-Mechanized orders < 10 lines)	90% within 24 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS 	
20. Average Reject Response Time: (Non-Mechanized orders ≥ 10 lines)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC
21. % Reject within 48 Hours: (Non-Mechanized orders < 10 lines)	90% within 48 Hours	<ul style="list-style-type: none"> • Resale Specials • UNE Specials 	
22. Average Reject Response Time: (Mechanized orders)		<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	FCC
23. % Reject within 2 Hours (Mechanized Orders):	90% within 2 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
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	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
24. % Reject within 72 Hours (All Orders ≥ 10 lines)	90% within 72 Hours	<ul style="list-style-type: none"> • Resale POTS • UNE POTS • Resale Specials • UNE Specials 	
25. Average Reject Response Time		<ul style="list-style-type: none"> • Interconnection Trunks 	FCC
26. % Rejects > 10 Business Days	See acknowledgement standard	<ul style="list-style-type: none"> • Interconnection Trunks 	FCC

Metric F - % Rejects:

This measure is defined as the Percent of orders received by the ILEC that are rejected or queried.

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
27. % Rejects		<ul style="list-style-type: none"> • Resale • UNE • Interconnection Trunks 	FCC

Metric G - Timeliness of Completion Notification:

Three performance measures will be reported. This measure is defined percent of completion notices sent on time as defined in standards below [Current FCC merger definition is defined as the average response time, used for BA-South states.] Measured from the notice to BA-NY billing service order system completion date to the distribution of the order completion notification. For any orders requiring coordination, such as a hot cut or trunk, notice of completion is done via verbal "handshake". This handshake is documented via serial numbers.

BA-NY:

Completion notifications for Resale orders received via EIF or WEB/GUI are delivered mechanically via DCAS. For resale orders received via EDI and all new UNEs, completion notice is currently faxed to CLECs. This performance metric is currently under development and will require modification throughout the guideline trial period.

FTR:

Provides notice of completion for resale, if carrier accepts WMS (wholesale management systems) notification

CLEC Requirements: For any order requiring coordination between carriers and physical hand-offs such as a hot cut, the CLEC must provide a serial number to the ILEC. This enables an audit trail for both parties. CLEC to define completion serial specifications.

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BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
28. Completion Notification – Average Response Time		• Resale • UNE • Interconnection Trunks	FCC
29. Completion Notification – % On Time	95% next business day by noon or by acceptance at turn-up via serial number	• Resale • UNE • Interconnection Trunks	

Metric H - % Flow Through Orders: Two performance measures will be reported. The number of orders processed through DCAS or ECG directly to Legacy provisioning OSS (Service Order System – SOP) without manual intervention as a percentage of total orders. These include “level 5” service orders requiring no secondary action for BA to type service order into SOP. Flow-Through measurements are reported on an aggregated basis and are not available on a CLEC specific basis.

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
30. % Flow Through		• Resale • UNE	FCC

Ordering Standards not included in Reports²:

- **Timeliness of Positive Acknowledgment of Valid Access Service Request (ASR);**
 - 1 - 96 Trunks - **Standard:** 24 Hours
 - Greater Than 96 Trunks - **Standard:** 48 Hours

LCUG Reference: LCUG OP4

- **Jeopardy Status:** Timeliness of receipt of notice of jeopardy of service order request (missed commitment with new date/time)

LCUG Reference: LCUG OP6

² Standards that are not reported can be tracked by the CLEC and reviewed with the incumbent LEC if performance falls below expected standard

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- **Resale:** To the extent that the incumbent has knowledge of a jeopardy condition, notice will be given as soon as it is known on or before committed due date. FTR reports jeopardy through WMS.
Standard: 24 Hours
- **Unbundled Network Elements:** To the extent that the incumbent has knowledge of a jeopardy condition, notice will be given as soon as it is known on or before committed due date.
Standard: 24 Hours
- **Interconnection Trunks:** In cases where jeopardy situation is identified.
Standard:
BA-NY: 2 Days Prior to Due Date
FTR: 5 Days Prior to Due Date

Provisioning:

All BA-NY Provisioning Reports:

Report Level:

Geography:

POTS: Four Market Areas: Manhattan, Greater Metro, Suburban and Remaining NY State.

Specials and Trunks: Lata 132 and Remaining NY State

Reported for:

Bell Atlantic Retail (*For trunks retail provisioning = IXC FGD Trunks*)

CLEC specific

CLEC aggregate

Metric I - Average Offered Interval:

This measure is defined as the average number of business days between order application date and committed due date. The application date is the date that a valid service request is received. The definition of application date is the same as Metric D - Order Confirmation Timeliness. Orders are grouped by volume of lines for POTS services and reported separately.

Total - No Dispatch: All orders that require NO dispatch outside of a Bell Atlantic Central Office. This includes orders that require switch translation and/or central office dispatch for wiring work. Line size is not broken out.

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Dispatch: An order requiring the dispatch of a Bell Atlantic Field technician outside of a Bell Atlantic Central Office. Intervals differ by line size. In all areas, for orders greater than or equal to 10 lines, a facility check is required and the interval negotiated. In many, but not all areas, a records facility check (in Engineering) is also performed for orders with 6 to 9 lines.

LCUG Reference: LCUG OP1

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
31. Average Interval Offered - Total - No Dispatch	Parity with BA Retail UNE HOT Cuts: (with or without INP): See Interval Summary	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials 	FCC for POTS only
32. Average Interval Offered - Total - Dispatch	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials 	FCC for POTS only
33. Average Interval Offered - Dispatch (1 - 5 Lines)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	FCC
34. Average Interval Offered - Dispatch (6 - 9 Lines)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	FCC
35. Average Interval Offered - Dispatch (≥ 10 Lines)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	FCC
36. Average Interval Offered - DS0 <i>under development:</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
37. Average Interval Offered - DS1 <i>under development:</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
38. Average Interval Offered - DS3 <i>under development:</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
39. Average Interval Offered - Total	Parity with IXC FGD	<ul style="list-style-type: none"> • IXC Feature Group D Trunks • Interconnection Trunks³ 	FCC

³ Interval performance is measured on a Purchase Order Number (PON) basis for trunks

Interim Guidelines for Carrier to Carrier Performance Standards & Reports
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FTR Reports:

For Interconnection Trunks:

Standard:

FTR: See Product Interval Summary

Metric J - Average Completed Interval:

This performance measure is the same as Metric I - Average Offered Interval with two key differences. The end point for the measure is actual completion date. Orders completed late due to a any end user or CLEC caused delay are excluded from this performance measurement.

Note: Reports % completed in 1, 2 and 3 days will be one of the first assessed during the 1998 sub team review.

BA-NY: Special services data reported as dispatch or no dispatch does not reflect use of technicians in central offices. All special services require CO dispatch. Intervals are not dependent on indication of outside dispatch, but are specific to the service offered. Retail, Resale and UNE performance captured on a mechanized basis from the same database.

LCUG Reference: LCUG OP1

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
40. Average Interval Completed (Total - No Dispatch)	Parity with BA Retail UNE HOT Cuts: (with or without INP): See Interval Summary	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials 	FCC for POTS only
41. % Completed in 1 Day (1 - 5 lines - No Dispatch)	Parity with BA Retail UNE HOT Cuts: (with or without INP): See Interval Summary	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
42. % Completed in 2 Days (1 - 5 lines - No Dispatch)	Parity with BA Retail UNE HOT Cuts: (with or without INP): See Interval Summary	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
43. % Completed in 3 Days (1 - 5 lines - No Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
44. Average Interval Completed (1 - 5 Lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • 	FCC

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	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
45. % Completed in 1 Day (1 - 5 lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
46. % Completed in 2 Days (1 - 5 lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
47. % Completed in 3 Days (1 - 5 lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	
48. Average Interval Completed (6 - 9 lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	FCC
49. Average Interval Completed (≥ 10 Lines - Dispatch)	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	FCC
50. Average Interval Completed - Total Dispatch	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
51. Average Interval Completed - DS0 <i>under development</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
52. Average Interval Completed - DS1 <i>under development</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
53. Average Interval Completed - DS3 <i>under development</i>	Parity with BA Retail	<ul style="list-style-type: none"> • Retail Specials • Resale Specials • UNE Specials 	
54. Average Interval Completed - Total	Parity with IXC FGD	<ul style="list-style-type: none"> • IXC Feature Group D Trunks • Interconnection Trunks 	FCC

Metric K - % Completed within 5 Days:

BA-NY Note:

Excludes "X" dated orders. ("X" is defined as an order where the customer requests a due date beyond the offered interval.) Orders completed late due to a CLEC or CLEC end user caused delay are excluded from this performance measurement. This measure reports only POTS services with 5 or fewer lines per order.

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BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
55. % Completed within 4 Days (1 - 5 Lines - Total)	Parity with BA Retail UNE HOT Cuts: See <i>Interval Summary</i>	• Retail POTS • Resale POTS • UNE POTS	
56. % Completed within 5 Days (1 - 5 Lines - Total)	Parity with BA Retail UNE HOT Cuts: See <i>Interval Summary</i>	• Retail POTS • Resale POTS • UNE POTS	FCC
57. % Completed within 6 Days (1 - 5 Lines - Total)	Parity with BA Retail UNE HOT Cuts: See <i>Interval Summary</i>	• Retail POTS • Resale POTS • UNE POTS	

FTR Reports:

Report Level:

Geographic Reports: Company

Reported Product Groups: • Retail POTS • Resale POTS (<i>Requires Development</i>)	<u>FTR Standard</u>
56. % Completed within 5 Days	Parity with FTR Retail

Metric L - % Missed Appointment - Company:

% Missed Appointment - Company:

Retail, Resale and UNE: The percentage of orders completed for which there was a missed appointment caused by the incumbent ILEC (Bell Atlantic or FTR). Excludes missed appointments caused by CLEC or any end user delays. Same definition of dispatch and no dispatch as previous measures.

Trunks: The percentage of trunks completed for which there was a missed appointment caused by Bell Atlantic. Same exclusions as above.

Average Delay Days:

For orders with missed appointments for company reasons, the average number of days between committed and actual completion dates.

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% Missed Appointments for Customer Reasons

The percentage of orders missed because the Customer or CLEC was not ready or available to accept service. This is not a measure of BA Performance and is used to identify areas for discussion with CLEC and possible improvement.

LCUG Reference: LCUG OP2

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
58. % Missed Appointment - BA - Total	<ul style="list-style-type: none"> * Resale & UNE: ⁴ * Trunks: parity IXC FGD 	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials • IXC Feature Group D Trunks • Interconnection Trunks 	FCC
59. Average Delay Days - Total	<ul style="list-style-type: none"> * Resale: Parity with BA Retail * UNE: See 60 & 61 * Trunks: parity IXC FGD 	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials • IXC Feature Group D Trunks • Interconnection Trunks 	
60. % Missed Appointment - Customer	NOT in BA Control	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials • IXC Feature Group D Trunks • Interconnection Trunks 	

* ⁴ Standard must be assessed in conjunction with dispatch and no dispatch missed appointments. Mix of dispatch versus no dispatch will vary among CLECs and to BA. See number 60 & 61.

*

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	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
61. % Missed Appointment - BA - Dispatch	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials 	FCC
62. % Missed Appointment - BA - No Dispatch	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials 	FCC

FTR Reports:

Report Level:

Geographic Reports: Company

Reported Product Groups: <ul style="list-style-type: none"> • Retail POTS • Resale POTS (<i>Requires Development</i>) 	<u>FTR Standard</u>
58. % Missed Appointment - Total	Parity with FTR Retail

Metric M - % Missed Appointment - Facilities:

BA-NY:

(Retail, Resale and UNE) Measures % of orders missed due to lack of outside plant facilities. All outside plant facility orders are dispatched. (Interconnection Trunks) The percentage of trunks completed for which there was a missed appointment due to lack of Bell Atlantic facilities - including outside plant and switch hooks.

LCUG Reference: LCUG OP9

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
63. % Missed Appointment - Facilities	Resale & UNE: Parity with BA Retail Trunks: Parity w/ IXC FG D	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials • IXC Feature Group D Trunks • Interconnection Trunks 	FCC

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FTR Reports:

Report Level:

Geographic Reports: Company

Reported Product Groups:	<u>FTR Standard</u>
<ul style="list-style-type: none"> • Retail POTS (<i>Requires Development</i>) • Resale POTS 	
63. POTS: Total Held Orders, by type and reason for delay	

Metric N - % Installation Troubles w/in 30 Days:

Percentage of Lines/Circuits/Trunks Installed for which a Network Trouble is reported and found within 30 days of installation (or service order activity). Note: Installation Troubles reported within 7 days are included in the percent of reports in 30 days.

LCUG Reference: LCUG OP3

BA-NY Reports:

	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure</u>
64. POTS: % Installation Troubles within 30 Days	Resale & UNE: Parity with BA Retail Trunks: Parity w/ IXC FG D	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS • Retail Specials • Resale Specials • UNE Specials • IXC Feature Group D Trunks • Interconnection Trunks 	FCC
65. POTS: % Installation Troubles within 7 Days	Parity with BA Retail	<ul style="list-style-type: none"> • Retail POTS • Resale POTS • UNE POTS 	

Provisioning Standards not included in Reports:

- Completion Interval Collocation:
- Avg. Interval Physical Collocation
 - Standard:** 76 Business Days (See interconnection agreements or consistent PSC Order 96-C-0036 – Order to resolve complaint to clarify ONA order issued Sept. 30, 1996)

LCUG Reference: None